



January 18, 2019

Central Coast Regional Water Quality Control Board  
Comments to AG Order 4.0

Water Board Staff:

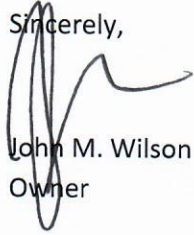
Thank you for the opportunity to provide comments and feedback on the proposed draft of Ag Order 4.0. The Central Coast vineyard industry has been a leader in cooperating with the Central Coast Regional Water Quality Control Board to do their part in the protection of surface and groundwater in order to maintain a safe water supply for everyone. Our main objective is to protect our environment and natural resources while we grow a quality crop with sustainable yields. We want to protect water quality, but we believe that the implementation of the new requirements must be derived from proven, science based studies.

We believe that not all farming operations should be treated the same. Generally vineyards are considered to be low risk to the environment due to the low nitrogen inputs, reduced risk pesticides and sustainable cultivation practices. Therefore, low risk farming practices should be considered a low prioritization in phasing into the new Ag Order 4.0.

Existing incentives should not be removed in the new Ag Order. We support the continuation of the cooperative monitoring program through Preservation, Inc. as opposed to a costly individual monitoring approach. One of the main tools utilized by the vineyard industry to monitor and verify that our farming practices meet the same standards as stated in the Ag Order 4.0 is the Sustainability in Practice (SIP) Certification. Through this program, we are held accountable for practices that not only maintain, but improve water quality. Practices are verified, measured and reported through a 3<sup>rd</sup> party auditor. The cost to farm and properly document a SIP certified operation is expensive, but the ultimate objective as stated above is achieved. Your proposed Ag Order would take a step backwards if all growers were viewed individually rather than as a group as we currently have with SIP Certification. We suggest continuing to work directly with SIP, as in previous Ag Orders, on our reporting requirements and avoid duplicating efforts and costs both to the grower and the Water Board Staff. The phasing of AG operations, and no longer using Certifications from a 3<sup>rd</sup> party to qualify for a lower tier, may result in individual reporting to the water board. This will increase the amount of work for the staff and would increase the cost of operation to the water board. We wish for these increased costs to not be passed on to growers.

We are open to meet and work with your staff to achieve a final draft of the Ag Order that works for growers who follow the same standards as we do to protect the water and environment that we all share.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line and a small upward flick.

John M. Wilson  
Owner